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Attorney for Plaintiff,

ASHLEY JOHNSON

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

ASHLEY JOHNSON,

Plaintiff,

vs.

BRETT TOMBLIN, in his individual capacity; )  
ASHLEY FROST, in her individual capacity; )  
ALAN ROSEN, in his individual capacity; )  
ANTHONY HORNE, in his individual )  
capacity; ZACHARY LONG, in his individual )  
capacity; CAMERON POMEROY, in his )  
individual capacity; COUNTY OF EL )  
DORADO, as a municipality; and DOES 1 )  
through 20, inclusive, )

Defendants.

) Case No.: 2:21-cv-01518-JAM-JDP  
)  
) **STIPULATION AND ORDER TO**  
) **CONTINUE CASE DEADLINES**

1 IT IS HEREBY STIPULATED, and respectfully requested, by and between Plaintiff and  
2 Defendants by and through their designated counsel, that:

3 WHEREAS, the parties have worked diligently to conduct discovery;

4 WHEREAS, since the setting of the last case schedule, the parties have encountered  
5 unexpected delays in conducting discovery;

6 WHEREAS, due to these circumstances, it is very unlikely that the parties can comply with  
7 the current discovery dates and case schedule;

8 WHEREAS, the current case schedule is set as:

9 **Discovery Cutoff** December 30, 2022

10 **Expert Witness Disclosures** October 11, 2022

11 **Rebuttal/Supplemental Expert** November 10, 2022  
12 **Witness Disclosures**

13 **Last Day to File Dispositive Motion** January 25, 2023

14 **Dispositive Motion Hearing** March 14, 2023

15 **Joint Mid-Litigation Statement** December 16, 2022  
16 **Filing Deadline**

17 **Pretrial Conference** May 12, 2023

18 **Trial** June 19, 2023

19 WHEREAS the parties have met and conferred and agreed to extend the discovery  
20 deadlines that have not already passed by 90 days and set the case schedule as proposed below:

21 **Discovery Cutoff** March 30, 2023

22 **Expert Witness Disclosures** October 11, 2022

23 **Rebuttal/Supplemental Expert** November 20, 2022  
24 **Witness Disclosures**

25 **Last Day to File Dispositive Motion** May 12, 2023

26 **Dispositive Motion Hearing** July 11, 2023

27 **Joint Mid-Litigation Statement** 14 days prior to close of discovery  
28 **Filing Deadline**

**Pretrial Conference** August 25, 2023 at 10:00 AM

1                   **Trial**

October 16, 2023 at 9:00 AM

2                   IT IS SO AGREED.

3                   Dated: December 6, 2022

ANGELO, KILDAY & KILDUFF, LLP

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7                   By: \_\_\_\_\_  
8                   DANIELLE J. WILLIAMS  
9                   Attorneys for Defendants COUNTY OF  
10                  EL DORADO, BRETT TOMBLIN,  
11                  ASHLEY FROST, ALAN ROSEN,  
12                  ANTHONY HORNE, ZACHARY LONG  
13                  AND CAMERON POMEROY

14                  Dated: December 6, 2022

THE WARD FIRM

15                  

16  
17                  By: \_\_\_\_\_  
18                  JUSTIN WARD  
19                  Attorneys for Plaintiff  
20                  ASHLEY JOHNSON

21                  **IT IS SO ORDERED.**

22  
23                  Dated: December 6, 2022

/s/ John A. Mendez  
\_\_\_\_\_  
24                  THE HONORABLE JOHN A. MENDEZ  
25                  SENIOR UNITED STATES DISTRICT JUDGE  
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